

GHAJAR EXHIBIT 35

11/13/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.
Highly Confidential

Michael Patrick Clark

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,)	
)	
Individual and Representative)	Lead Case No.
Plaintiffs,)	
)	3:23-cv-03417-VC
v.)	
)	
Meta Platforms, Inc.,)	
)	
Defendant.)	
)	

** H I G H L Y C O N F I D E N T I A L **

30(b)(1) VIDEOTAPED DEPOSITION OF
MICHAEL PATRICK CLARK

Denver, Colorado

Wednesday, November 13, 2024

Reported stenographically by:
Michelle Kirkpatrick, RDR-CRR-CRC-CRI, FCRR

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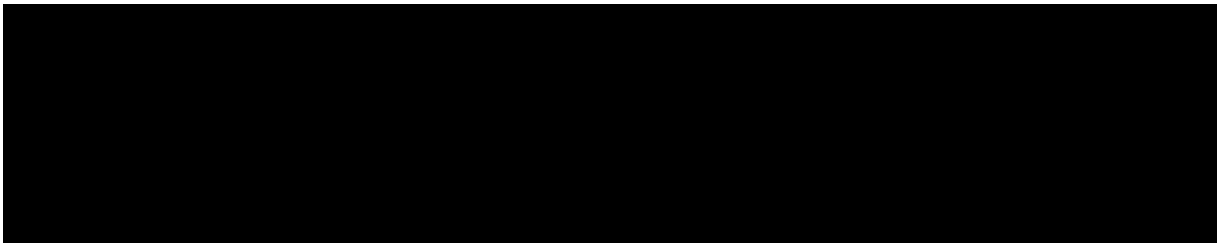
1 BY MR. STEIN:

2 Q Good morning, Mr. Clark.

3 A Good morning.

4 Q Please state your full name.

5 A Michael Patrick Clark.



9 Q Are you presently employed?

10 A Yes.

11 Q By whom?

12 A Meta.

13 Q Could you say the full corporate name of
14 the entity that employs you?

15 A Meta. I . . .

16 Q Is it Meta Platforms? Meta, Inc.?

17 Do you know which entity --

18 A I do not.

19 Q Okay. What is your current title?

20 A Director of product management.

21 Q Is there anything that follows that title,
22 like a specific division or department?

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1 A I work in the Generative AI organization.

2 Q Have you testified before?

3 A I have.

4 Q How about a deposition in particular?

5 A I have done a deposition before.

6 Q Okay. Could you list all the depositions
7 that you remember?

8 A I, in approximately 2003, was in a
9 deposition for a telecom that I worked for,
10 TouchAmerica, about a billing dispute. I was in
11 another one in 2004.

12 I was employed by News Corporation,
13 Photobucket, in 2008, and was a part of -- I can't
14 remember if it was two or three depositions,
15 around -- around patent claims of a company I had
16 worked for that was acquired.

17 And then in -- I've done a few depositions
18 in my time at Meta, while I worked in Privacy. I
19 did a deposition for the case around Cambridge
20 Analytica and -- did a couple of depositions around
21 that, and a few around platform enforcement, around
22 privacy and scraping.

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1 team on generative AI, so I had two PMs reporting to
2 me and a couple of contractors. And then in
3 October, when I switched roles, I didn't have
4 anybody reporting to me.

5 Q When was that?

6 A That was when I was no longer reporting
7 into the Privacy organization but reported into the
8 Generative AI organization.

9 Q And that's your current role?

10 A Title is the same.

11 When I moved over, I was moving over to
12 help on the internal infrastructure on how the teams
13 use Llama but also, on the Generative AI side, build
14 out some of the mitigations and infrastructure
15 around -- around how data gets trained, how it gets
16 used.

17 And then in July, I switched -- July 2024,
18 I switched roles to focus just on agents.

19 Q Understood.

20 Okay.

21 And before you switched to work on agents,
22 you were working, you mentioned, on mitigation.

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1 And that included IP mitigation?

2 A That does. Yes.

3 Q When you were in that role, who reported
4 to you?

5 A At which point in time? Prior to October
6 of 2023 or between October 2023 and July of 2024?

7 Q Let's do both.

8 A Okay. Prior to October of 2023, I had
9 Jonathan McPhie, who started in Meta in July of
10 2023; and I had Kit, K-i-t, Karru, K-a-r-r-u, who
11 started -- who had reported to me in a prior role,
12 then moved over to work on generative AI in about
13 the March or April time frame of '23.

14 Q And what are they doing now?

15 A Both of them are still working on that in
16 Privacy.

17 Q Okay. And you said there was another --
18 another time period where you might have had
19 different people reporting to you?

20 A So from October of '23 to July of 2024, I
21 had nobody reporting to me.

22 Prior to -- prior to working on

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1 STENOGRAPHIC REPORTER'S CERTIFICATE

2 I, Michelle Kirkpatrick, a Registered
3 Diplomat Reporter, Federal Certified Realtime
4 Reporter, do hereby certify that previous to the
5 commencement of the examination, the deponent was duly
6 sworn by me to testify to the truth.

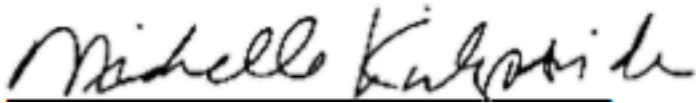
7 I further certify that this deposition
8 was taken in shorthand by me at the time and place
9 herein set forth and was thereafter reduced to
10 typewritten form, and the foregoing constitutes a true
11 and correct transcript.

12 I further certify that I am not related
13 to, employed by, nor of counsel for any of the parties
14 or attorneys herein nor otherwise interested in the
15 outcome of this action.

16 IN WITNESS WHEREOF, I have hereunto set
17 my hand this 18th day of November, 2024.

18

19



MICHELLE KIRKPATRICK

20

RDR-CRR-CRC-CRI, FCRR

21

Registered Diplomat Reporter

22

Federal Certified Realtime Reporter